

AFFIDAVIT OF M.R.

STATE OF NEW YORK      )  
                            )  
                            ) ss:s.  
County of Rockland      )

M.R., an adult of legal age, hereby states and deposes under the pains and penalties of perjury:

1. I am a plaintiff in this action and provide the following known to me personally to be true.

2. My husband and I have two sons who have been excluded from Green Meadow Waldorf School (GMWS) for over three months: R (age 11, grade 5) and E (age 4, pre-school). GMWS is not just my children's school but is in fact the very reason we live in New York.

3. Seven years ago, I left my hometown, my family and friends, and my professional contacts to move to Chestnut Ridge, NY, so we could provide a very unique K-12 Waldorf Education for our children. GMWS is also my husband's place of employment. This is currently his 20<sup>th</sup> year as a Waldorf educator. He is a member of the faculty and part of his benefit package is access to subsidized housing on campus, making it possible for our family to afford to live in this area. Therefore, this school and the school community comprises our social circle, is the source of our single income stream, health insurance, etc. Basically, our entire lives in New York are tied to the school.

3. We made this great leap of faith because of the very unique qualities of Waldorf Education and of the greater GMWS community. Waldorf Education strives to meet each growing child in a developmentally appropriate way in order to nurture the whole child – academically, physically, emotionally, and spiritually. Because of the promises of this educational philosophy, it is now the fastest growing type of independent education in the world.

4. What have we as a family done to compensate for the loss of this education during this exclusion order? How does one person begin to provide substitution for the dynamic experience the children have every day they are at school? How does one begin to quantitatively measure the irreparable harm done to my children, my family, our school, and the school community and the social relationships comprised therein when what we are talking about is so multi-faceted and enriching? How does one measure irreparable harm done on a constantly growing and changing human being? Especially when we as parents, (individually and collectively as a parent body) in conjunction with the school, have been working tirelessly to minimize said harm?

5. What I can tell you is that my whole family has been under an enormous amount of strain the last three months. My husband, who holds leadership positions at the school in addition to teaching full time, has been carrying an enormous burden of stress, both professionally and personally, as he considers the potential long-term negative consequences the exclusion ban could have on the school and our family while trying to help the faculty navigate through unchartered territory in the short term. My youngest son had just started school for the very first time this past fall and was thriving in the Forest Pre-School, a unique outdoor-based program offering at GMWS. This very active, spirited, inquisitive, and strong boy was finally getting the physical outlet he requires. This satiation of needs was having a soothing effect on our whole family and his time in school allowed me some one-on-one time with our young daughter (now age 2) and also to attend to the rest of my familial duties. I know that

being excluded like this at such a young age and for seemingly inexplicable reasons is having psychological and emotional impacts on him, the real long-term impacts of which I fear are still to come.

6. During this time of exclusion, while I have been trying to wrangle this very active 4-year-old boy and keep my daughter safe, I have been trying to educate my bright emerging adolescent son, who with each passing day I fear is falling behind academically while at the same time falling out socially. He was spending more and more time in solitary activities, and then, unable to control his bottled-up energy, his bubbling hormones, and his frustration, boredom and loneliness would act out in inappropriate ways. Managing my three children who all have such different needs became impossible. This, coupled with the strain on my marriage, was taking a toll on my mental and emotional health and was triggering my latent problem with anxiety. With all of these stressors weighing on us, we finally made the difficult decision to go against our own beliefs and inoculate our oldest son so he could return to school.

7. Obviously, this decision was not made lightly, just as our decision not to vaccinate our children was not made lightly. Deciding between our religious rights and our children's right to an education is not a choice one should have to make. We believe firmly the Biblical teaching that "children are a gift from God" (Psalm 127:3) and that God has entrusted us as parents [not the State of New York] with the care and welfare of the children (I Timothy 5:8). Further, the Bible also teaches that there have been times in history when evil governments and government employees have attempted through force, intimidation, or color of law to harm and destroy the children of God's people (Exodus 1 & 2 and Matthew 2). This divinely given responsibility for the care and welfare of our children led us to the decision not to vaccinate, based on all the research we conducted. It is also based on this same tenet that we then decided to get our oldest child vaccinated. We weighed the overall negative impacts of the current situation on him and our whole family and decided it to be the best course of action.

8. Back in 1910, one set of my great-grandparents immigrated to the United States from Russia. They left all they knew behind them for New York – known around the world as a beacon of religious tolerance. These relatives of mine were Jewish and while treatment of Jews in Russia at that time was appalling, what finally made my brave and bold great-grandmother say "enough is enough" is when the government decreed that Jewish kids could no longer attend school. Now, 109 years later, the government of New York is telling me my children cannot go to school because of our religious beliefs. And now the time has come for this mother to stand up and say, "enough is enough".

M.R.  
M.R.

Signed and sworn to before me this 5<sup>th</sup> day of March 2019.

  
NOTARY PUBLIC

MY COMMISSION EXPIRES:

MICHAEL HOWARD SUSSMAN  
Notary Public, State of New York  
No. 02SU6332584  
Qualified in Orange County  
Commission Expires Nov. 09, 2019